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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

JEREMIAH COOK, an individual,

Plaintiff,

v.

TEQUILA THURMAN in her individual
capacity, **CARRIE HUTCHISON** in her
individual capacity, and **RYAN LUFKIN** in
his individual capacity,

Defendants.

Case No. 3:24-cv-01481-AB

**UNOPPOSED MOTION FOR LEAVE TO
CONDUCT DEPOSITION OF DEVIN
ROWELL**

LR 7-1 Certification

Pursuant to Local Rule 7-1, counsel for Defendant Tequila Thurman conferred with counsel for Plaintiff and counsel for Defendants Hutchison and Lufkin, and this motion is unopposed.

Motion

Pursuant to Rule 30(a)(2)(B) of the Federal Rules of Civil Procedure, Defendant Tequila Thurman hereby moves this Court for leave to depose Devin Alexander Rowell, who is currently incarcerated at Two Rivers Correctional Institution ("TRCI").

The testimony of Mr. Rowell is necessary because Plaintiff's complaint leaves open the

possibility he is contesting his guilt, Mr. Rowell was in the chain of the drug dealing activity and has relevant information about Mr. Cook's involvement in the drug activity at issue in this case. Furthermore, Mr. Rowell may have information directly related to how the investigation and prosecution of this matter were conducted; both matters at issue in the complaint filed by Mr. Cook.

Mr. Rowell's testimony is relevant to prove or disprove facts of consequence in determining the action; specifically, the allegation that Mr. Cook was misled by police or prosecutors into pleading guilty and to the core issue of guilt supporting the plea and sentencing in the underlying matter.

Counsel for Defendant Thurman has been in contact with TRCI and is actively engaged in the process of scheduling his deposition and will coordinate with TRCI to ensure that the deposition is conducted in accordance with all applicable regulations and without undue burden on the institution.

DATED: March 24, 2025

Respectfully submitted,

/s/ Michael K. Porter

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